

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
JEFFREY COHEN, on behalf of himself :
individually, and on behalf of all similarly :
situated employees, : No. 09 Civ. 4352 (PKC)
:
: ORAL ARGUMENT
Plaintiff, : REQUESTED
:
:
v. :
:
GERSON LEHRMAN GROUP, INC., :
Defendant. :
:
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**PLAINTIFF'S NOTICE OF MOTION FOR PRELIMINARY CERTIFICATION
PURSUANT TO THE FAIR LABOR STANDARDS ACT, FOR COURT-FACILITATED
NOTICE TO SIMILARLY SITUATED PERSONS AND FOR EXPEDITED
DISCOVERY**

PLEASE TAKE NOTICE that, upon the Declaration of Douglas H. Wigdor, the exhibits annexed thereto, the Affidavit of Plaintiff Jeffrey Cohen, the Affidavit of Rachel Hoffheimer, the exhibits annexed thereto, and the accompanying Memorandum of Law, and pursuant to the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 216(b) and Fed. R. Civ. P. 7(b), Plaintiff Jeffrey Cohen will move the Court, at a date and time to be assigned by the Court, for (i) preliminary certification of his FLSA claims as a collective action; (ii) Court-facilitated notice of the FLSA claims to similarly situated persons; and (iii) expedited discovery of names and contact information for potential collective action members.

Dated: New York, New York
June 15, 2009

Respectfully submitted,
THOMPSON WIGDOR & GILLY LLP

By: _____ /s/
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COUNSEL FOR PLAINTIFF AND THE CLASS